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10 UNITED STATES DISTRICT COURT  
11 DISTRICT OF NEVADA

12 COREY GERWASKI,  
13 Plaintiff,

14 vs.

15 STATE OF NEVADA ex rel.  
16 BOARD OF REGENTS OF THE  
NEVADA SYSTEM OF HIGHER  
17 EDUCATION, on behalf of the  
UNIVERSITY OF NEVADA, LAS  
18 VEGAS; CHRISTOPHER HEAVEY,  
in his official capacity as current  
19 UNLV Interim President; AJP  
EDUCATIONAL FOUNDATION  
20 INC., A California Non-Profit  
Corporation; STUDENTS FOR  
21 JUSTICE OF PALESTINE-UNLV;  
22 NATIONAL STUDENTS FOR  
JUSTICE OF PALESTINE; DOES I-  
23 XX and ROE entities I-XX.

24 Defendants.

Case No.: 2:24-cv-00985

STIPULATION TO EXTEND AJP  
EDUCATIONAL FOUNDATION INC.'s  
AND STUDENTS FOR JUSTICE OF  
PALESTINE-UNLV's DEADLINE TO  
FILE RESPONSE TO SECOND  
AMENDED COMPLAINT

**(SECOND REQUEST)**

AND

FOR PLAINTIFF TO ADDRESS  
DEFENDANT AJP EDUCATIONAL  
FOUNDATION INC.'S RULE 11 LETTER

**(FIRST REQUEST)**

25 Pursuant to LR IA 6-1, Plaintiff COREY GERWASKI and Defendants AJP  
26 EDUCATIONAL FOUNDATION INC. and STUDENTS FOR JUSTICE OF PALESTINE-  
27 UNLV, by and through their respective counsel, stipulate as follows:  
28

1           **WHEREAS**, on June 3, 2025, Plaintiff filed his Second Amended Complaint (ECF No.  
2 79).

3           **WHEREAS**, on June 20, 2025, the Court granted a Stipulation to Extend the Deadline  
4 for Defendants AJP Educational Foundation, Inc., Students for Justice in Palestine – UNLV, and  
5 State of Nevada *ex rel.* Board of Regents of the Nevada System of Higher Education on behalf of  
6 the University of Nevada, Las Vegas and Christopher Heavey in his official capacity as current  
7 UNLV Interim President, to file a Responsive Pleading to the Second Amended Complaint to  
8 July 25, 2025 (ECF No. 85).

9           **WHEREAS**, on July 2, 2025, Defendant AJP Educational Foundation, Inc. served its  
10 letter of intent to file a Motion for Sanctions under FRCP 11.

11           **WHEREAS**, the Plaintiff has requested a meeting to discuss possible resolution.

12           In light of the above:

13           Plaintiff and Defendants AJP Educational Foundation, Inc., and Students for Justice in  
14 Palestine – UNLV hereby stipulate to an extension from July 23, 2025, to July 30, 2025, for  
15 Plaintiff to decide whether to withdraw Plaintiff’s Second Amended Complaint in response to  
16 Defendant AJP Educational Foundation, Inc.’s July 2, 2025, letter of intent to file a Motion for  
17 Sanctions under FRCP 11 against Plaintiff.

18           Plaintiff and Defendants AJP Educational Foundation, Inc., and Students for Justice in  
19 Palestine – UNLV also hereby stipulate to extend the deadline for Defendants AJP Educational  
20 Foundation, Inc., and Students for Justice in Palestine to respond—via answer or motion to  
21 dismiss—to Plaintiff’s Second Amended Complaint from July 25, 2025, to August 1, 2025, for  
22 Defendants AJP Educational Foundation, Inc., and Students for Justice in Palestine – UNLV.

23           This is the second request for an extension of the deadline related to the responses to the  
24 Second Amended Complaint. This is the first request for an extension related to Defendant AJP  
25 Educational Foundation, Inc.’s letter of intent to file a Motion for Sanctions under FRCP 11.

26           Plaintiff and his counsel reserve all rights regarding responding to Defendant AJP  
27 Educational Foundation, Inc.’s letter of intent to file a Motion for Sanctions under FRCP 11.  
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Good cause exists to extend these deadlines, as the parties to this stipulation are meeting to discuss possible avenues to resolution, and it could potentially obviate the need for a response to the operative complaint and avoid unnecessary fees and costs.

Respectfully submitted,

Dated: July 22nd, 2025

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\*The Constitutional Law Center for Muslims in  
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**ORDER**

**IT IS THEREFORE ORDERED**, with good cause appearing, that the Parties' Stipulation above is granted and Defendants AJP Educational Foundation, Inc., and Students for Justice in Palestine – UNLV, date for responses to Plaintiff's Second Amended Complaint shall be extended to August 1, 2025. Moreover, Plaintiff's deadline to respond to Defendant AJP Educational Foundation, Inc.'s letter of intent to file a Motion for Sanctions under FRCP 11 shall be extended to July 30, 2025.

IT IS SO ORDERED.

Dated 7-28-25.

  
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UNITED STATES MAGISTRATE JUDGE